

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.
LITIGATION

) Civil Action No. 04-10294-DPW
) (Lead Case)
)
)

THIS DOCUMENT RELATES TO:
ALL CASES

) **DECLARATION OF PAMELA A.**
) **MARKERT IN SUPPORT OF BPI**
) **GLOBAL ASSET MANAGEMENT**
) **LLP'S MOTION FOR CLASS**
) **CERTIFICATION**
)
)
)
)

I, Pamela A. Markert, declare:

1. I am an associate attorney at Gold Bennett Cera & Sidener LLP, counsel for lead plaintiff BPI Global Asset Management LLP ("BPI Global"). I submit this declaration in support of BPI Global's motion for class certification. The matters stated herein are true of my own personal knowledge and, if called to testify thereto, I could and would competently do so.

2. Over the course of my involvement in this litigation, I have interviewed, both on the telephone and in person, numerous current and former employees of BPI Global/Trilogy Global Advisors that were employed by BPI Global during the class period of March 28, 2002 through March 26, 2004 ("Class Period") and who have voluntarily made themselves available to me to provide information and respond to requests regarding the litigation.

3. During an on-site visit to BPI Global/Trilogy Global Advisor's offices in Orlando, several employees, all but two of whom worked at BPI Global during the Class Period, assisted me in locating responsive documents and in providing information to respond to defendants' discovery requests.

4. Between August 14, 2006 and October 30, 2006, BPI Global produced 15,836 pages of documents responsive to defendants' requests for documents.

5. Mr. John Myklusch, former Chief Financial Officer ("CFO") and Chief Compliance Officer ("CCO") of BPI Global and currently CFO and CCO of Trilogy Global Advisors, LLC, has been available to counsel on an ongoing basis, both via telephone and in person, to assist with factual information and documents necessary for discovery and to consult regarding litigation strategy. He devoted many hours preparing for his deposition, which lasted several hours, and spent additional time on review of his transcript.

6. Mr. John Bichelmeyer, former portfolio manager at BPI Global, has been available to counsel on several occasions to assist with factual information necessary for discovery. He devoted many hours preparing for his deposition, which lasted several hours, and spent additional time on review of his transcript.

7. Mr. Charles Sweeney, former Controller and CCO of BPI Global, has made himself available to counsel, both via telephone and in person, to assist with factual information necessary for discovery. He devoted many hours preparing for his deposition, which lasted several hours, and spent additional time on review of his transcript.

8. BPI Global has issued thirty-one third party document production subpoenas.

9. Attached hereto are true and accurate copies of the following documents:

- Exhibit A: excerpts from the deposition transcript of John Francis Myklusch dated November 3, 2006, and errata letter dated January 18, 2007.
- Exhibit B: excerpts from the deposition transcript of John P. Bichelmeyer dated November 15, 2006 and his Errata Sheet.
- Exhibit C: excerpts from the deposition transcript of Charles Sweeney dated November 21, 2006.
- Exhibit D: Defendants' Rule 30(b)(6) deposition notice dated September 13, 2006. When BPI Global identified the witnesses it would be producing in response to the notice, amended notices were received with the deponents names, deposition locations and dates. However, the schedule of topics remained the same and was identical for each deponent.
- Exhibit E: Transcript of the scheduling conference and hearing for the appointment of Lead Plaintiff on June 28, 2004.
- Exhibit F: Transcript of the hearing for the appointment of Lead Plaintiff and Lead Counsel on August 10, 2004.
- Exhibit G: Certificate of Plaintiff and attached schedules filed April 12, 2004 attached as Exhibit A to the Declaration of Joseph M. Barton. (Docket No. 35-2)
- Exhibit H: Affidavit of Michael J. Killeen filed July 6, 2004. (Docket No. 90-3)
- Exhibit I: Affidavit of Charles E. Sweeney and Exhibit A (May 31, 1999 Advisory Agreement) filed July 6, 2004. (Docket No. 90-2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of February 2007.

/s/ Pamela A. Markert
Pamela A. Markert